

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION  
4  
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6 \*\*\*\*\*

7 IN RE:  
8 NATIONAL PRESCRIPTION OPIATE MDL NO. 2804  
9 LITIGATION

10 This document relates to: Case No. 17-MD-2804  
11  
12 All cases Hon. Dan A. Polster

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13 HIGHLY CONFIDENTIAL - SUBJECT TO  
14 FURTHER CONFIDENTIALITY REVIEW  
15 VIDEOTAPED DEPOSITION OF:

16 STEVE REARDON  
17 ALOFT BOSTON SEAPORT  
18 401-403 D Street  
19 Boston, Massachusetts

20 November 30, 2018 9:03 a.m.

21  
22 Darlene M. Coppola  
23 Registered Merit Reporter  
24 Certified Realtime Reporter

1 what we're trying to do is prevent diversion,  
2 isn't it?

3 A. Yes.

4 Q. So if we have an order that we've  
5 determined is suspicious, we wouldn't want to give  
6 it to the people we think are placing the  
7 suspicious order, would we?

8 MR. PYSER: Object to form.

9 BY MR. FULLER:

10 Q. That wouldn't make sense?

11 A. No.

12 Q. We would want to do whatever due diligence  
13 we need to do to confirm that it is not a  
14 suspicious order before we ship it, correct?

15 MR. PYSER: Object to form.

16 A. Correct.

17 BY MR. FULLER:

18 Q. Now, let's talk a little bit more about  
19 these ingredient limit reports. And I've heard  
20 you say several times today that these ingredient  
21 limit reports were approved by the DEA.

22 Tell the jury who at the DEA approved  
23 these ingredient limit reports.

24 A. I believe there's a letter out there by

1 Thomas Gitchel.

2 Q. Thomas who?

3 A. Gitchel.

4 Q. Can you help me out with the spelling of  
5 that last name?

6 A. G-i-t-c-h-e-l.

7 Q. And when was that letter sent?

8 A. It was around 1990.

9 Q. And in 1990, you believe some letter is  
10 out there that exists that says it's okay to  
11 provide the ingredient limit reports?

12 A. There was a collaboration between the DEA  
13 and the trade association to develop the report.

14 Q. You don't happen to have a copy of that  
15 letter, do you?

16 A. I do not.

17 Q. Because any communications between the DEA  
18 and Cardinal, there's been an order that that's  
19 supposed to be produced to the plaintiffs, and I  
20 have not seen that letter.

21 A. I --

22 MR. PYSER: Object to form.

23 BY MR. FULLER:

24 Q. Might that be one of those documents that